

April 3, 2020

The Honorable William M. Conley  
U.S. District Court – Western District of Wisconsin  
120 North Henry Street, Room 320  
Madison, Wisconsin 53703

Re: ***DNC v. Bostelmann*, No. 3:20-cv-249, -278, -284 (consol.)**  
**Response to Defendants' Motion for Clarification**

Dear Judge Conley:

On Defendants' two requests for clarification (*DNC* Doc. 174), Intervenor take the following positions:

1. Although Intervenor are very concerned about the implications of the Court's order and have appealed certain aspects of it, Intervenor believe that permitting the public release of interim results while absentee ballots are still being completed and submitted would only exacerbate the potential negative effects on ballot security and election integrity. Indeed, that is why the statute generally prohibits tabulation of absentee ballots before the election is completed. Intervenor thus encourage the Court to adopt the WEC's proposed position.

2. The Court indicated at the hearing that it was not inclined to make retroactive rules for people who already had submitted absentee ballots without the witness signature required by statute. Intervenor note that permitting submissions of statements separately from the ballot itself will only increase the confusion and logistical hurdles for election officials who are now forced to operate on an extremely tight timeline to finalize the election results.

Sincerely,

/s/ Patrick Strawbridge  
Counsel for Intervenor-Defendants  
Republican National Committee and  
Wisconsin Republican Party